

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

TOWN OF IPSWICH,
Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,
Defendant.

CIVIL ACTION
NO. 05-11114-MLW

JOINT MOTION TO EXTEND TWO DEADLINES IN CASE SCHEDULING ORDER

The plaintiff Town of Ipswich (“Ipswich”) and the defendant National Union Fire Insurance Company of Pittsburgh, PA (“National Union”) hereby move this court jointly to extend two of the deadlines set forth in the scheduling order for this case as follows: 1) extend the deadline for filing initial disclosures under Fed. R. Civ. P. 26(a)(1)(E) from November 18, 2005 to December 16, 2005; and 2) extend the deadline to serve written discovery requests from December 1, 2005 to January 3, 2006.

As grounds for this motion, Ipswich and National Union state that they are presently mediating the matter, with one mediation session having occurred on November 4, 2005 and a second mediation session scheduled for December 6, 2005, and they believe that it is in the best interests of both the parties and this Court to have the mediation conclude before the parties incur time and expense with further pleadings such as initial disclosures and written discovery. Each

of the deadlines is requested to be extended by only thirty days, and the other deadlines in the scheduling order for this case are not requested to be changed.

PLAINTIFF TOWN OF IPSWICH
By its attorneys,

DEFENDANT NATIONAL UNION
FIRE INSURANCE COMPANY OF
PITTSBURGH, PA

/s/ Peter E. Ball

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Dated: November 22, 2005

CERTIFICATE OF SERVICE

I, John P. Connelly, hereby certify that on this ____ day of November, 2005 I served a copy of the foregoing by electronic mail upon the plaintiff's attorneys: Peter E. Ball, Esquire, Sally & Fitch LLP, 225 Franklin Street, Boston, MA 02110, and Kurt S. Kusiak, Esquire, Sally & Fitch LLP, 225 Franklin Street, Boston, MA 02110.

/s/ John P. Connelly

John P. Connelly

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